

LAW OFFICE OF TODD D. LERAS
Todd D. Leras, CA SBN 145666
455 Capitol Mall, Suite 802
Sacramento, California 95814
(916) 504-3933
toddleras@gmail.com
Attorney for Defendant
DAVID HANSEN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
DAVID KENNETH HANSEN,
Defendant.

Case No.: 2:20-cr-021 TLN

STIPULATION AND ORDER
CONTINUING STATUS CONFERENCE
AND EXCLUDING TIME UNDER THE
SPEEDY TRIAL ACT

Date: February 2, 2023
Time: 9:30 a.m.
Court: Hon. Troy L. Nunley

Plaintiff United States of America by and through Assistant United States Attorney James Conolly, and Attorney Todd Leras on behalf of Defendant David Hansen, stipulate as follows:

1. This matter is presently set for a status conference on February 2, 2023. By this stipulation, Defendant Hansen moves to continue the status conference to March 23, 2023.

ORDER CONTINUING STATUS
CONFERENCE

2. This case involves drug trafficking and firearm charges stemming from execution of search warrants in Sacramento and Placer Counties.
3. The government produced supplemental discovery materials in July 2022, including hundreds of hours of video recordings, downloaded onto an external hard drive provided by defense counsel. These video recordings are so voluminous that they required computer storage space of approximately two terabytes. These recordings also contain information regarding potential defense investigation related to sentence mitigation.
4. Defendant David Hansen is in pre-trial custody. On January 5, 2023, Mr. Hansen was moved from the Sacramento County Main Jail to the Wayne Brown Correctional Facility (WBCF) in Nevada City, California. WBCF is located approximately 65-miles from defense counsel's office in downtown Sacramento. Defense counsel's review of the supplemental discovery materials with Mr. Hansen has been made more difficult by Mr. Hansen's relocation to WBCF.
5. The defense is conducting investigation based on the supplemental discovery provided by the government. In addition, defense counsel is discussing proposed settlement with Mr. Hansen. The defense therefore requests additional time to complete its investigation.
6. Given the ongoing defense investigation and Mr. Hansen's pre-trial housing location, the defense requests to continue the status conference in this matter to March 23, 2023, at 9:30 a.m., and to exclude time between February 2, 2023, and March 23, 2023, inclusive, under Local Code T-4. The United States does not oppose this

ORDER CONTINUING STATUS
CONFERENCE

request.

7. Attorney Todd Leras represents and believes that failure to grant additional time as requested would deny Defendant Hansen the reasonable time necessary for effective preparation, considering the exercise of due diligence.
8. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, within which trial must commence, the time period of February 2, 2023 to March 23, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), and (B) (iv) [Local Code T-4] because it results from a continuance granted by the Court at Defendant Hansen's request on the basis that the ends of justice served by taking such action outweigh the best interest of the public and the Defendant in a speedy trial.
9. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Assistant U.S. Attorney James Conolly has reviewed this proposed order and authorized Todd Leras via email to sign it on his behalf.

DATED: January 30, 2023

PHILLIP A. TALBERT
United States Attorney

By /s/ Todd D. Leras for
JAMES CONOLLY
Assistant United States Attorney

DATED: January 30, 2023

By /s/ Todd D. Leras
TODD D. LERAS
Attorney for Defendant
DAVID HANSEN

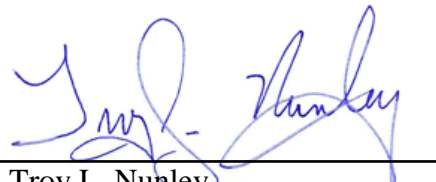
ORDER CONTINUING STATUS
CONFERENCE

ORDER

BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is hereby ordered that the status conference in this matter, scheduled for February 2, 2023, is vacated. A new status conference is scheduled for March 23, 2023, at 9:30 a.m. The Court further finds, based on the representations of the parties and Defendant Hansen's request, that the ends of justice served by granting the continuance outweigh the best interests of the public and the Defendant in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into consideration the exercise of due diligence for the period from February 2, 2023, up to and including March 23, 2023.

IT IS SO ORDERED.

DATED: January 30, 2023


Troy L. Nunley
United States District Judge

ORDER CONTINUING STATUS
CONFERENCE